

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE**

JERRY L. IVERY AND JACQUELINE D. IVERY,)	
)	
)	
Plaintiffs,)	
v.)	CASE NO. 2:08-CV-02205
)	
AMERIQUEST MORTGAGE COMPANY,)	
)	
Defendant.)	

**CERTIFICATE OF CONSULTATION RE:
AMERIQUEST'S MOTION FOR STAY OF ALL PROCEEDINGS**

Pursuant to Local Rule 7.2, Defendant Ameriquest Mortgage Company ("Ameriquest") files this Certificate of Consultation with respect to its contemporaneously filed Motion for Stay of All Proceedings. Ameriquest's counsel attempted to confer with Plaintiffs' counsel regarding this motion but, despite her best efforts, was unable to do so. Ameriquest's counsel's secretary first attempted to fax a copy of the proposed motion and memorandum in support on Tuesday, June 3, 2008. The fax was not working, so she called Plaintiffs' counsel, and he gave her his e-mail address. Ameriquest's counsel's secretary e-mailed the proposed motion and memorandum in support, as well as a cover letter from Ameriquest's counsel, asking Plaintiffs' counsel to contact her as soon as possible regarding the motion. Plaintiffs' counsel did not respond.

On Friday, June 6, 2008, Ameriquest's counsel sent an e-mail at 10:00 a.m. asking Plaintiff's counsel to call or e-mail by the close of business that day as the motion was time sensitive. Ameriquest's counsel also called Plaintiff's counsel and left him a telephone message at approximately 11:30 a.m. on Friday, June 6, 2008, asking Plaintiff's counsel to contact her by the close of business. As of the filing of the accompanying motion, Ameriquest's counsel has not been contacted by Plaintiff's counsel and the time sensitivity of the motion necessitates its filing.

This the 6th day of June, 2008.

/s/ Katherine K. Layhew

Katherine Knight Layhew (BPR # 22274)

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Counsel for Ameriquest Mortgage Company

CERTIFICATE OF SERVICE

I hereby certify that on June 6th, 2008, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to the following:

Paul A. Robinson, Jr., Esq.,
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Counsel for Plaintiff

/s/ Katherine K. Layhew

Katherine Knight Layhew (BPR # 22274)